

EXHIBIT B

Complaint to Trans Union, LLC

IN THE CIRCUIT COURT OF THE STATE OF OREGON

22CV11005

FOR THE COUNTY OF MULTNOMAH

KHOSROW NAVAIE,

Plaintiff,

v.

TRANS UNION LLC

Defendant.

Case No:

COMPLAINT FOR CREDENTIAL
ECONOMIC INJURIES

Plaintiff alleges:

1.

At all times material herein, TransUnion is credit reporting agency located in Chicago, IL 60661, and do businesses with public consumers within all states in United States.

2.

TransUnion uses Vantage Score 3.0 reporting model for their consumers.

3.

Credit Karma is an online credit reporting agency located in the United States,
(a). Credit Karma adapts Vantage Score 3.0 reporting model for their consumers.

4.

1 In March of 2021, I made a large payment, over \$1400 into my DISCOVER
2 Credit card. With that payment along with an additional smaller payment in March
3 of 2021 into my Discover card. As a result of those two payments I made, my Discover
4 Card account balance was substantially lowered.

5 (a). Discover Credit card company reported my payments to Transunion and
6 other credit bureaus, as they are obligated by Fair Credit Reporting Act (FCRA).

8 5.

9 In March of 2021, I did make payments to my other credit cards accounts.
10 (a). In March of 2021, I did not have any missed payment to my other credit cards
11 accounts.

12 6.

13 In March of 2021, I noticed my Transunion credit score dropped a whopping
14 55 points, right after I had made the two larger payments into my Discover account.

15 7.

16 My Transunion score before dropping was over 700, on Vantage 3.0 score.

17 8.

18 The big drop in my credit score had caught my attention, because it looked
19 very unusual and did not fall in the Score System criteria.

20 (a). The recommended and prescribed for ALL credit scores models have a
21 some basic workouts in common, regardless of type of scores or the reporting agency.

22 (b). The very simple basic calculations of credit scores based as following:

23 (c). The high-low impact criteria on credit scores across the board.

24 (d). The basic high-low impact scores calculation system is common within all
25 reporting agencies, but varies in a overall score, depending on the weigh of high to low
26 model the agency uses. The basic high-low impact model has been described as follows:
27 1: payment history(on-time, late, missed..) utilization have high impact.
28 2: charge off, delinquent, bankruptcy.. have high impact.

27

1 3: The length of a credit established, number of inquiries (medium impact).

2 4: Number of accounts opened or active (medium to low impact).

3 9.

4 At the time when my credit score dropped 55 points, I did not have any major or
5 high negative impact on my credit cards. Some of account balances increased slightly, and
6 other balances were decreased as well. My overall account balance(increased vs decreased)
7 was a positive, over \$1000. And as a result of my high payments, my overall account
8 utilization dropped.

9 10.

10 As a foreseeable result of the Transunion of 55 points score dive reporting on my
11 credit profile, placed me in a very difficult position to apply for a loan for my business, or
12 apply for other credit cards. All of these happened in the midst of Pandemic, when businesses
13 were slow, and I was trying to hire employees and move on with my business.

14 11.

15 I disputed this incident to TranUnion, and the company replied as they were
16 investigating. Nevertheless, their final investigation did not repair my credit profile, and did
17 not retain or upgrade my credit score, as I expected to happen based on the previous
18 argument and assessment mentioned herein (8).

19 12

20 As a foreseeable result of TransUnion conduct, I suffered financial hardship, and
21 negative credit profile impact. I had to borrow private loans to keep me afloat on my
22 business and my expenditure.

23 Wherefore, plaintiff prays for judgement against the defendant, TransUnion LLC
24 as follows:

25 (a). Financial and economic damage to my personal and business recovery
26 in the sum of \$18000.00.

27 Dated this ^{5th} 31 day of March 2022.

29 By: Khosrow Navaie

KHOSROW NAVAIE

P.O.B 1964

Gresham OR. 97030